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5 Attorney for Plaintiff  
VEM MILLER  
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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 VEM MILLER,

11 Plaintiff,

12 vs.

13 CHAD BIANCO, in his individual and  
14 official capacities; COUNTY OF  
RIVERSIDE, a municipal entity;  
15 RIVERSIDE COUNTY SHERIFF'S  
DEPARTMENT; DAVID  
16 CORONADO; and DOES 1 through 100,

17 Defendants.  
18  
19

CASE NO.: 5:25-cv-00629-KK (DTBx)

**DECLARATION OF MICHAEL  
LUJAN IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANTS' NOTICE OF  
MOTION AND MOTION TO  
DISMISS AND SPECIAL MOTION  
TO STRIKE PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

20 I, Michael Lujan, do hereby declare and state as follows::

- 21 1. I am citizen of the United States of America, over 18 years of age. Except where  
22 stated on information and belief, the facts contained in this declaration are based  
23 on my personal knowledge. If called upon to testify, I could and would  
24 competently do so.
- 25 2. My name is Captain Michael Lujan. I am an honorably retired captain with the  
26 Riverside County Sheriff's Department. My career encompassed 31 years of  
27 service with assignments in corrections, field operations, homicide and  
28

1 administration, from October 6, 1989 to December 30, 2020. I am highly  
2 experienced in the procedures within the Sheriff's department, and therefore I am  
3 qualified to provide analysis on the topic of Vem Miller's arrest on October 12,  
4 2024, followed by the false accusations of him being a "3rd Trump assassin",  
5 with "Fake Ids", "fake passports", "fake entry passes", etc.

6 3. When a critical or noteworthy arrest is made, a Notification of Incident (NOI) is  
7 written and forwarded up the chain of command to include the sheriff's executive  
8 staff, who would then brief the sheriff of any serious offense that would require  
9 a response or comment to the media. The NOI provides a brief description of the  
10 arrest and investigation. In a case as this, the sheriff would require a direct  
11 briefing from the executive staff and boots on the ground.

12 4. Per policy, the arresting deputy is required to author a report before going home.  
13 The report would be scanned and forwarded to Sheriff's Administration for  
14 reference to include all supporting documentation, records, photos, interview  
15 summary etc.

16 5. The arresting deputy and assisting deputies will then dock their body worn  
17 cameras which are automatically downloaded to the server. Supervisors and  
18 administrators have immediate access to the footage and can be reviewed  
19 remotely from any sheriff's station within the county.

20 6. Additionally, a verbal briefing with the arresting deputy and supervisor can be  
21 requested by the Sheriff to clarify any confusion. A briefing is typically  
22 conducted to avoid disseminating false information to the public. In this briefing,  
23 there would be a "briefing packet" that includes the suspects background, records  
24 check, criminal history, weapons, photos of suspect, weapons and vehicle.  
25 Furthermore, the sheriff has TFO's (Task Force Officers) assigned to federal  
26 agencies with access to the FBI's JTTF (Joint Terrorism Task Force) with federal  
27 databases to assist with the intelligence gathering, Social Media, dissemination  
28 of intelligence and briefing to the sheriff.

- 1 7. In the Miller case, a review of his social media and quick background check  
2 would have been done prior to a press release. This review would have been  
3 conducted by the JTTF federal partners or the Special Investigations Bureau  
4 (SIB) Intel Unit that included the TFO's and numerous crime analysts assigned  
5 to the SIB.
- 6 8. Furthermore, the Riverside County Sheriff's Department has the ability to verify  
7 the authenticity of ID documents through the FBI's JTTF.
- 8 9. I have personally witnessed and or participated in major incident briefings that  
9 follow the protocol listed above.

10  
11 I declare under penalty of perjury under the laws of the United States of America  
12 and the State of California that the foregoing is true and correct.

13 EXECUTED on July 2, 2025 in Los Angeles, California.

14  
15 By:  (JUL 2, 2025 21:46 PDT)

16 Michael Lujan  
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# Declaration of Michael Lujan

Final Audit Report

2025-07-03

Created:	2025-07-03
By:	Ethan Bearman (ethan@thebearmanfirm.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAwFf-ooxlnhiF0hvHWWj3eYe6T94yHcsV

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-  Document created by Ethan Bearman (ethan@thebearmanfirm.com)  
2025-07-03 - 4:23:59 AM GMT- IP address: 75.54.194.246
-  Document emailed to Michael Lujan ([REDACTED]@aol.com) for signature  
2025-07-03 - 4:24:02 AM GMT
-  Email viewed by Michael Lujan ([REDACTED]@aol.com)  
2025-07-03 - 4:27:20 AM GMT- IP address: 172.226.184.31
-  Document e-signed by Michael Lujan ([REDACTED]@aol.com)  
Signature Date: 2025-07-03 - 4:46:13 AM GMT - Time Source: server- IP address: 174.195.193.74
-  Agreement completed.  
2025-07-03 - 4:46:13 AM GMT